



HM Government

Debt Management Vulnerability Toolkit for frontline debt management staff

Created by Government Debt Management Function

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How to use this toolkit

This toolkit has been developed by the Fairness Group, led by the Government Debt Management Function (GDMF), with representatives from government organisations, the debt advice sector and other support organisations.

This toolkit is intended to enable frontline staff to identify and help customers who may need additional support (sometimes called ‘vulnerable customers’) in a debt management context. It is designed to be easy-to-use, including while interacting with customers, to provide prompts and guidance.

You can work through this toolkit at your own pace or if you know what you’re looking for, you can use the ‘quick links’ on the next page to quickly navigate to the information you need.

When using tools like those included here, it’s important to remember to still be flexible to the conversation and the customers’ needs – try to avoid sounding like you are following a script and adapt to what the customer is saying as needed.

Alongside this toolkit, we have also produced a guide specifically for service managers and policy

makers, it offers examples of best practice and changes that can be considered and incorporated into policy design and processes. View the service managers and policy makers toolkit on [GOV.UK](https://www.gov.uk)

The GDMF Fairness Group have also produced a dedicated **Public Sector Economic Abuse Toolkit** which provides detailed information on how public sector bodies recovering debt can understand, identify and support people who may have experienced or may be experiencing economic abuse.

With special thanks to the members of the Fairness Group Vulnerability Sub-Group who helped shape this toolkit, to Carol Campling and Grace Brownfield who led the development of it, to all the organisations who reviewed and fed into its content and to Chris Fitch, Vulnerability Lead (Money Advice Trust) and Research Fellow (Personal Finance Research Centre, Bristol University), for lending his expertise to this project.

If you have any feedback on the toolkit and how it could be improved, please contact the Government Debt Management Function.

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Quick links

Identifying customers who need additional support

Sets out cues that may indicate a customer needs additional support, as well as suggested prompt questions you can ask when you pick up on something from a customer that may indicate this.

TEXAS (handling disclosures)

Use for responding to a customer telling you about a condition or circumstances that means they may need additional support. Also used for gathering the information you need from them to be able to help.

IDEA (gaining more information about circumstances)

Used for gaining a more detailed understanding of the customer's situation in order to take effective action.

CARERS Protocol (handling disclosures from carers)

Used for handling disclosures from carers and third parties.

BLAKE Protocol (supporting suicidal customers)

Used for managing disclosures of suicidal thoughts, for as long as you need to – for example, until you are able to make an internal or external referral following your organisations' individual suicide policy.

BRUCE Protocol (supporting customers with mental capacity limitations)

Used for identifying and supporting customers who may have difficulties with decision making, or have mental capacity limitations which affects their ability to understand, remember or 'weigh-up' information that is shared with them.

Referring people for more support

Key points to remember when referring a customer for additional support, either internally or externally.

Looking after your own wellbeing

Used for documenting the support available from your organisation, to help you deal with challenging calls.

Identifying customers who need additional support ('vulnerable customers')

An individual may:

- make a direct disclosure by either; call, letter, email, webchat, get help forms or other available channels:
 - “My circumstances are bad, can you help?”
 - “I’m not very well at the moment and am finding it difficult.”
- makes an indirect disclosure:
 - “I’m really struggling today, I’m so down.”
 - “I don’t understand you.”



Remember to look out for cues that indicate the customer may need support.

Individual factors

- Passing mentions of illness, disability or impairment.
- Reference to contact with the health sector or social care sector.
- Reference to the receipt of specific benefits.
- English as an additional language.

Behavioural cues

- Sounding flustered or anxious.
- Displaying frustration or anger.
- Asking unrelated questions.
- Forgetfulness.
- Struggling to concentrate or understand detail.
- Difficulty regulating emotional responses (being upset, tearful).
- Difficulty trusting the service or individual.
- Confusion – including not knowing where debt has come from.

Wider circumstances

- Life events (such as time in hospital, bereavement, income shocks).
- Rising cost of living – mentions of higher bills, use of foodbanks, struggling to pay / being behind on household bills.
- Excessive or unusual expenditure.
- Signs of unstable housing situation (e.g. mentions worries about eviction, staying with friends, unable to provide fixed contact details).
- Signs of abuse, including economic abuse (e.g. mention of a partner spending their income or creating the debt, seeming to be taking instructions from their partner or having concerns about protecting their personal privacy or safety). For more information on economic abuse, please see the [Economic Abuse toolkit](#).
- Unexplained spending and / or budget showing a surplus or balanced budget, but customer not having enough money to keep up with commitments (could indicate problem gambling, or undeclared debt such as illegal money lender).

Organisational actions

- Reference by the customer to things that have or haven't been done that have caused difficulty.

There may also be indicators in the data / information you can see about a customer that could indicate they need additional support. For example:

- vulnerability flags (if your organisation uses these) or information on vulnerability recorded following previous interactions.
- missed payments data.
- information on other support being received, such as their receipt of disability benefit or whether they receive local Council Tax Support.

If a carer or third party makes the disclosure, you can use the **CARERS Protocol** to manage this.

Indirect disclosures – questions to ask¹

If you pick up on something from a customer that indicates they may need additional support, you can explore this using prompt questions, such as those listed below.

Remember, most customers will not object to a simple but polite question about their wellbeing and situation, and in fact may welcome this concern.

Show you've been listening

“I heard you mention being quite unwell and off work for some time now. If you tell us what’s happening, we might be able to help you out.”

“You mentioned that you’ve not been able to put the heating on as money is very tight. If you tell me a little bit more about your financial situation, we can make sure we take that into account.”

¹ Questions have been produced, with permission, based on content in Chris Fitch, Jamie Evans and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps](#).

Show you've been observing

"I noticed that our paperwork might be a little difficult to follow – can you tell me how we could make it easier for you to complete it?"

"I know our letters can contain a lot of information – was there anything you didn't understand that I could talk you through?"

Normalise their situation

"When they need it, we can provide our customers with more support or time to sort out any difficulties they are having. What might we be able to help with?"

Ask directly

"Can I ask you a question – is everything OK at the moment? If not, is there something that we can do to help, or to make it easier for you to work with us to resolve your situation?"

Stay with it, if needed

A customer may instinctively say they are fine; they may be worried about where the conversation might go and the implications of disclosing a vulnerability. Where possible, reassure the customer, and they may feel more comfortable talking:

"Not a problem. But if there is something causing you difficulties, that is impacting on your finances, I will listen and take that into account. Is there anything causing difficulties?"

"Many of our customers found it helpful to talk about their wider situations so that we could offer further support."

If the customer really doesn't want to talk, accept this but keep the door open:

"OK, do let me know if there is an issue though. We will always try to help."

"That's OK, but if anything changes in the future, I am here to help you."

Handling disclosures of vulnerability – TEXAS²

The TEXAS tool should be used for responding to a customer telling you about a condition or circumstances that means they may need additional support and gathering the information you need from them to be able to help.

2 Reproduced with permission from Chris Fitch, Jamie Evans, and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps.](#)



T – Thank the customer

What they have told you could be useful for everyone involved:

“Thanks for telling me about your situation, as it will help us take this into account.”

E – Explain how the information will be used

This is a data protection requirement:³

- “Let me explain how we’d like to use that information, just so you know.”

This explanation should include why the information is being collected, how it will be used to help decision making, and who the data will be shared with/disclosed to.

X – Obtain explicit consent

Also a data protection requirement:

- “Are you happy to give me permission to note down and save the information you’ve shared with me today?”

A – Ask the customer questions to get key information

These will help you understand the situation better:

- “How does your situation make it difficult to manage your finances?”
- “How does your situation affect your ability to communicate with us?”
- “Does anyone help you manage your finances, such as a carer, relative, or other third party?”

S – Signpost or refer to internal and external help

Where this is appropriate, consider whether you need to:

- internally refer the individual to a specialist team / staff member in the organisation.
- sign-post to an external organisation (following your own organisation’s signposting policy)

³ Organisations will have their own data protection policies setting-out the lawful bases for processing data. TEXAS has been developed to comply with policies where explicit consent is the processing base for special category data, and where consent or another base is used for personal data. Where a different set of processing bases are used, readers are advised to speak with their Data Protection Officer, consult the ICO website, and read the [Money Advice Trust and MALG’s guide: Vulnerability, GDPR and disclosure](#).

Gaining more information about circumstances – IDEA⁴

Use this tool when you need a more detailed understanding of the customer's situation to take effective action. This could include establishing whether changes need to be made to the usual debt collection processes or understanding what further support may be required. It works across the whole range of vulnerabilities that a customer may present with.

⁴ Reproduced with permission from Chris Fitch, Jamie Evans, and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps](#).



I – Impact

Ask the customer what the vulnerable situation either stops them from doing in terms of their financial situation, or what it makes it harder for them to do.

- “What has the impact been on your personal and financial situation?”

For written correspondence, ask yourself what you can learn from any letter or email about how the vulnerable situation is affecting the customer’s circumstances.

D – Duration

Establish how long the customer has been living with the reported vulnerability, as the duration of different situations or conditions will vary.

This can inform decisions about the amount of time a customer may need to consider certain options or take positive steps to improve their financial situation.

- “So when did this first start to happen?”

E – Experiences

Understand the nature of the vulnerability – is it a one-off, or something they’ve had experience of before? Make sure to take fluctuating situations into account (including the effects of any medication) and consider how the person’s situation or condition is likely to impact them now and in the future. This will involve considering both what support the customer needs in relation to their vulnerability, and how this relates to addressing the customer’s financial situation.

- “To help me understand your situation better, can you tell me whether this has happened before?”
- “How has it been?”

A – Assistance

Establish whether the customer has been able to get any care, help, support or treatment for their condition or situation. This can be useful to know for any conversations on getting evidence of the condition (if needed) and to help understand if you need to refer the customer for additional support from an external agency.

- “Is there anything else we should know about the treatment or care you’re receiving? It could help us to support you better in the future.”

When you encounter the unfamiliar

The IDEA tool is designed to help even when you don't know much about the vulnerable situation the customer is facing – going through each of the four points can help give you an understanding of their situation and how it impacts them.

If you need to, you can ask for clarification if you're not familiar with the condition or illness they are talking about:

- “I'm really sorry, but I don't know very much about [name of condition] – if you don't mind, could you tell me a little more about it?”
- “I'm really sorry to ask, but could you tell me more about [name of condition]? It's just so I have a better understanding of what it involves.”

Handling Disclosures from carers – CARERS Protocol⁵

Use this tool to help you handle disclosures from carers and other third parties.

⁵ Reproduced with permission from Chris Fitch, Jamie Evans, and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps.](#)



C – Check for authority.

If the carer or third party has evidence of their authority to act on the customer's behalf, a more detailed discussion can be arranged (once evidence has been supplied).

If the carer cannot supply this evidence, or needs to share information about the customer now, follow steps A to S.

A – Avoid discussing any account details, making sure to explain to the carer why this isn't possible.

R – Reassure the carer that their concerns can still be recorded as observations (unverified) on the customer's account and can be looked into.

E – Explain to the carer their observations will need to be shared with the customer and other colleagues (carers will need to give their consent for this).

R – Record the carer's observations, listening carefully, and ensuring:

- you have checked why the customer is unable to speak directly with the organisation about these issues (for example they may have communication issues).
- you are clear how the customer's vulnerable situation affects their ability to repay.
- you have confirmed with the carer what information has been recorded, and how long these unverified observations will be held on file while they are being checked.

S – Summarise the next steps, which might include:

- you (or a colleague) speaking with the customer concerned to establish if there is a problem, including checking the unverified observations made by the carer.
- the carer discussing with the customer a potential mandate to act on their behalf.
- the carer and customer working together to collect supporting medical evidence.

Supporting suicidal customers – BLAKE protocol⁶

When speaking with a customer thinking of suicide, always follow your organisation's suicide policy / process, which should cover what you're expected to do, what immediate referrals should be made, how terminated calls should be dealt with, what ongoing help is available for the customer and the support you can access as a staff member.

The BLAKE protocol can also help. It is not a substitute for your organisation's suicide policy (which you should always follow), but rather a tool you can use to aid the conversation with someone thinking of suicide.

⁶ Reproduced with permission from Chris Fitch, Jamie Evans, and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps](#).



It will help you to manage disclosures of suicidal thoughts for as long as you need to – for example, until you are able to make an internal or external referral. BLAKE is designed so you can make a referral at any point in the conversation.

B – Breathe (to focus)

It can be scary to hear something like this, so take a moment to simply breathe and focus your thoughts. You can do this by acknowledging what the customer has said:

- “I’m so sorry to hear you feel that way. How can we help?”

L – Listen (to understand)

We always take what the customer has shared seriously, but we also always listen carefully so we can assess the imminent risk of harm.

Listen to the customer using verbal nods and recapping key information to show your understanding.

A – Ask (to discover)

Listening is important, but where gaps continue to exist in your understanding about the current situation, you should ask questions to fill these.

The example questions on the next page can help – aim to put these into your own words and avoid using them as a script.

K – Keep safe (from harm)

Based on your understanding of the situation, and also your organisation’s policy, the emergency services should be contacted if the customer is at imminent risk of harm. During this, you may need to stay on the line to keep talking with the customer. Reassure the customer that your primary concern is their safety, and that any financial difficulty can be dealt with later.

- “I’m worried about what you’ve told me – what can we do to keep you safe?”

E – End (with summary)

Once customer safety has been addressed, if it is possible to do so, staff should summarise what has been discussed and agreed, so that the call can end (and any data-recording can begin).

- “We’ve been talking for a while, but before we finish let me summarise what we agreed and what will happen next...”

Example questions

Following a suicide disclosure, you will need to judge whether to 'ease in' to the conversation with general questions, or be more direct. Remember, polite but direct questions are important in helping you establish the circumstances and the risk to the customer – most people will not object to this, and will usually welcome that you are trying to help.

General questions:

- What has led to these feelings?
- How long have you felt this way?
- Have you spoken to anybody about how you are feeling?
- How far have you taken your thoughts about suicide?
- What support or help are you receiving?

Direct questions:

- Do you have a plan to do this (how, when, where)?
- Where are you now? (This is key for the emergency services.)
- Are you alone (is there anyone there who can help you)?

Questions about support:

- What can we do to help you?
- What can we do to keep you safe?
- Has anyone else helped you before that we could call?

High-risk situations

Contact the emergency services if a customer:

- is currently harming themselves, just has, or is about to.
- is unable to respond (e.g. because they are losing consciousness).
- clearly intends to take their own life.
- has a suicide plan in place.

Be aware that the risk of suicide is higher if the customer has:

- also taken alcohol, drugs, or medication.
- attempted suicide previously.
- a mental health problem or history of these problems.

You will want to find out:

- the location of the customer (if not already known).
- whether they are alone (other people may be able to help).
- if they have taken any drugs, alcohol, or medication.

Supporting customers with mental capacity limitations – BRUCE Protocol⁷

Use this tool to identify and support customers who may have difficulties with decision making or have mental capacity limitations which affects their ability to understand, remember or ‘weigh-up’ information that is shared with them.

Once problems with understanding, remembering or weighing-up information have been identified using BRUCE, you can hold a more effective conversation that is tailored to the customer’s circumstances.

⁷ Reproduced with permission from Chris Fitch, Jamie Evans, and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps](#).



For example, you may need to allow the customer more time to speak, you may need to repeat, simplify or re-explain information, offer information in writing, use simpler, more concise and jargon-free language, or ask the customer to summarise their understanding.

B – Behaviour and talk

Is there a limitation in the customer's behaviour and speech?

R – Remembering

Is the customer experiencing problems with their memory or recall?

U – Understanding

Does the customer understand the information they are being given by staff?

C – Communicating

Can the customer communicate their thoughts, questions, and ultimately a decision about what they want to do?

E – Evaluating

Can the customer 'weigh-up' the different options open to them?

When using BRUCE, always:

- presume customers have the mental capacity to make the decision in question, unless proof emerges they cannot do this.
- provide reasonable support to individuals to help them make their own decisions.
- remember that the decision is always the customers to make – customers are allowed to make unwise decisions.
- avoid guessing what is 'wrong' with a customer – focusing instead on the decision-making difficulties a customer has, providing support to overcome these, and encouraging them (if possible) to talk about their difficulties.

Referring and signposting people for more support

If it's clear from your conversation with a customer that there is an issue affecting them, and their financial situation, that is beyond your organisation's remit, you may need to refer them for more support.

Remember, this may be needed before a customer can fully engage with the debt collection process – as it may be severely impacting their finances.

Referral may be:

- a straightforward internal referral (e.g. to a specialist support team).
- an external agency – either as signposting or a referral.

In either case, follow your organisation's signposting and referral process/policy.



To make sure the referral is as effective as possible:

- be clear about what the organisation does and how they may be able to help – a customer is much more likely to follow up a recommendation if they understand what the organisation may be able to do for them.
- give the customer the key, appropriate information they need to follow-up the signpost or referral, such as providing contact details (ideally multiple options such as phone and email) opening times, website and address.
- if applicable, explain whether there might be a charge for the services and what these costs might be (e.g. solicitors fees).

Looking after your own wellbeing

Dealing with challenging calls can be difficult. Calls can be challenging for lots of reasons, and may impact on you in different ways at different times – what you find difficult one month, you may not necessarily find difficult the following month, for example.

This is okay. What's important is that you don't bear this on your own and to get help and support when you need it.



Your organisation should have a clear offer of support for frontline staff. Make sure you are aware of what specific support your organisation can offer during and post-call / customer interaction – you can write it down in the box below as a reminder.

Support available during a customer interaction

Jot down specific support your organisation can offer:

The importance of debriefing

Debriefing can help you to process a difficult or traumatic situation, ideally before moving onto other clients, so a quick and informal conversation with a colleague, manager or supervisor before you see or speak with your next client can be very useful. Find out what debriefing support is available in your organisation, and use this as needed.

Ideally, you should use a debrief to:

- share your experience from the call.
- reflect on how you felt and how you feel now.
- discuss any challenging elements, as well as elements you found satisfying or that went well.
- highlight any learnings.
- reflect on anything you did to make you feel okay afterwards, and any further support you need.

It's important not to underestimate the power of debriefing – especially if you are working from home and may not have the chance to casually debrief naturally with colleagues in the office.